

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

**AGA Medical Corp.,**

**Plaintiff,**

**v.**

**W. L. Gore & Associates, Inc.,**

**Defendant.**

No. 0:10-cv-3734 (JNE/JSM)

**DECLARATION OF MYOKA KIM  
GOODIN AND EXHIBITS IN  
SUPPORT OF GORE'S  
MEMORANDUM IN OPPOSITION  
TO AGA'S MOTION TO COMPEL  
IMMEDIATE DISCOVERY  
CONCERNING THE GORE  
SEPTAL OCCLUDER DISCLOSED  
AT THE 8TH INTERNATIONAL  
WORKSHOP ON  
INTERVENTIONAL PEDIATRIC  
CARDIOLOGY IN MILAN, ITALY**

1. I, Myoka Kim Goodin, am an attorney at the law firm of Locke Lord Bissell & Liddell LLP and I represent Defendant W.L. Gore & Associates, Inc. ("Gore") in this action. I submit this Declaration in support of Gore's Memorandum in Opposition to AGA's Motion to Compel Immediate Discovery Concerning the Gore Septal Occluder Disclosed at the 8th International Workshop on Interventional Pediatric Cardiology in Milan, Italy.

2. Attached hereto as Exhibit 1 is a true and correct copy of Gore's Preliminary Noninfringement Claim Chart.

3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiff AGA Medical Corporation's Preliminary Claim Chart.

4. Attached hereto as Exhibit 3 is a true and correct copy of a Law360 article

dated June 16, 2011 entitled “AGA Hits Occlutech With IP Suits in Germany, UK” regarding AGA’s lawsuits in Germany and United Kingdom.

5. Attached hereto as Exhibit 4 is a true and correct copy of a PR Newswire article dated March 4, 2011 entitled “Occlutech Wins Swedish Court Ruling Against AGA-St Jude Medical” regarding AGA’s lawsuit in Sweden.

6. Attached hereto as Exhibit 5 is an excerpt of a true and correct copy of AGA Medical Holdings, Inc.’s July 20, 2009 Amendment No. 6 to Form S-1 filing with the Securities and Exchange Commission, obtained from the Securities and Exchange Commission’s EDGAR database, listing AGA’s pending patent litigations worldwide.

7. Attached hereto as Exhibit 6 is a true and correct copy of Defendant Gore’s First Set of Requests For Production of Documents and Things to Plaintiff AGA.

8. Attached hereto as Exhibit 7 is a true and correct copy of Plaintiff, AGA Medical Corp.’s Responses to Defendant Gore’s First Requests For Production of Documents and Things (Nos. 1-81).

9. Attached hereto as Exhibit 8 is an excerpt of a true and correct copy of a Preliminary Prospectus/Offer to Exchange entitled “St. Jude Medical, Inc. Offer to Exchange Each Outstanding Share of Common Stock of AGA Medical Holdings, Inc. For \$20.80 in Cash Or \$20.80 is Fair Market Value of St. Jude Medical, Inc. Common Stock.”

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of July, 2011.

/s/ Myoka Kim Goodin

Myoka Kim Goodin (CA #229073)  
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W.L. GORE & ASSOCIATES, INC.